

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

MISSISSIPPI STATE CONFERENCE OF THE
NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE; DR.
ANDREA WESLEY; DR. JOSEPH WESLEY;
ROBERT EVANS; GARY FREDERICKS; PAMELA
HAMNER; BARBARA FINN; OTHO BARNES;
SHIRLINDA ROBERTSON; SANDRA SMITH;
DEBORAH HULITT; RODESTA TUMBLIN; DR.
KIA JONES; MARCELEAN ARRINGTON;
VICTORIA ROBERTSON,

Plaintiffs,

vs.

STATE BOARD OF ELECTION COMMISSIONERS;
TATE REEVES, *in his official capacity as Governor of
Mississippi*; LYNN FITCH, *in her official capacity as
Attorney General of Mississippi*; MICHAEL WATSON,
*in his official capacity as Secretary of State of
Mississippi*,

Defendants,

AND

MISSISSIPPI REPUBLICAN EXECUTIVE
COMMITTEE,

Intervenor-Defendant.

**CIVIL ACTION NO.
3:22-cv-734-DPJ-HSO-LHS**

PLAINTIFFS' FIRST NOTICE OF DEPOSITION OF DR. THOMAS BRUNELL

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, counsel for Plaintiffs Mississippi State Conference of the National Association for the Advancement of Colored People, Dr. Andrea Wesley, Dr. Joseph Wesley, Robert Evans, Gary Fredericks, Pamela Hamner, Barbara Finn, Otho Barnes, Shirlinda Robertson, Sandra Smith, Deborah Hulitt, Rodesta Tumblin, Dr. Kia Jones, Marcelean Arrington, and Victoria Robertson

will proceed to take the deposition of Dr. Thomas Brunell. The deposition will be held on Friday, January 5, 2024, at 9:00 am at Butler Snow LLP, 2911 Turtle Creek Blvd # 1400, Dallas, TX 75219.

Details regarding the court reporter service will be emailed to those participating once all arrangements are finalized. The deposition shall be taken before a Notary Public or some other officer authorized by law to administer oaths for use at trial. The deposition will be taken by oral examination with a written and/or sound and visual record made thereof (e.g., videotape, LiveNote, etc.). The deposition will be taken for the purposes of cross-examination, discovery, and for all other purposes permitted under the Federal Rules of Civil Procedure or any other applicable law.

Dated: December 6, 2023.

/s/ Joshua F. Tom

Joshua Tom, MSB 105392

jtom@aclu-ms.org

ACLU OF MISSISSIPPI

101 South Congress Street

Jackson, MS 39201

(601) 354-3408

Robert B. McDuff, MSB 2532

rbm@mcdufflaw.com

MISSISSIPPI CENTER FOR JUSTICE

767 North Congress Street

Jackson, MS 39202

(601) 969-0802

Carroll Rhodes, MSB 5314

Law Offices of Carroll Rhodes

crhodes6@bellsouth.net

PO Box 588

Hazlehurst, MS 39083

(601) 894-1464

John P. Lavelle, Jr.

MORGAN, LEWIS & BOCKIUS LLP

1701 Market Street

Philadelphia, PA 19103-2921

Telephone: +1.202.739.3000

Facsimile: +1.202.739.3001

john.lavelle@morganlewis.com

Drew C. Jordan

MORGAN, LEWIS & BOCKIUS LLP

1111 Pennsylvania Ave. NW

Washington, DC 20004-2541

Telephone: +1.713.890.5000

Facsimile: +1.713.890.5001

drew.jordan@morganlewis.com

Ari J. Savitzky

asavitzky@aclu.org

Ming Cheung

mcheung@aclu.org

Casey Smith

csmith@aclu.org

ACLU FOUNDATION

125 Broad Street, 18th Floor

New York, New York 10004

(212) 549-2500

Patricia Yan

pyan@aclu.org

ACLU FOUNDATION

915 15th Street NW

Washington, DC 20005

(202) 457-0800

Ezra D. Rosenberg

erosenberg@lawyerscommittee.org

Jennifer Nwachukwu

jnwachukwu@lawyerscommittee.org

David Rollins-Boyd

drollins-boyd@lawyerscommittee.org

**LAWYERS' COMMITTEE FOR CIVIL
RIGHTS UNDER LAW**

1500 K Street NW Suite 900

Washington, DC 20005

(202) 662-8600

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I, Joshua Tom, hereby certify that on December 6, 2023, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to all parties on file with the Court.

/s/ Joshua Tom
Joshua Tom